



April 28, 2009

EPA Region 10  
Solid Waste and Toxics Unit  
1200 Sixth Ave, Suite 900  
Seattle WA 98101  
Attn: Dan Duncan

Recycling  
& Recovery

RE: Unmanifested Waste Report – Emerald Recycling

Marine &  
Industrial Cleaning

Dear Mr. Duncan;

As you are aware, Emerald Recycling (Emerald) received a load of PCB contaminated oil from Purcell Equipment, 17227 Hwy 9, Snohomish, Washington. The attached information is being provided per the requirements for an unmanifested waste report under 40 CFR Part 761.211.

Recycled Products

1) EPA Identification Number, Name and Address of the PCB Commercial Storage or Disposal Facility:

Waste Treatment  
& Disposal

Temporary Storage: Emerald Recycling  
1500 Airport Way S.  
Seattle WA 98134  
WAD 058 367 152

Automotive Fluids  
Management

TSDF: Clean Harbors (Aragonite), LLC  
11600 N. Aptus Rd, Exit 56  
Aragonite UT 84029  
UTD 981 552 177

Construction  
Services

2) Date the commercial storage or disposal facility received the unmanifested PCB waste:

Unmanifested PCB waste was received on April 2, 2009 at Emerald Recycling. PCB waste was confirmed as regulated under TSCA on April 9, 2009 and April 14, 2009.

Transportation  
Services

3) The EPA Identification Number, Name, and Address of the Generator and Transporter:

Vacuum Truck  
Services

Generator: Purcell Equipment  
17227 Hwy 9  
Snohomish WA 98296  
EPA ID # WAH 000 032 066

Portable Storage

USEPA REG



0001026

*Your Partner for Recycling and Environmental Services*

Corporate Office: 7343 E. Marginal Way So. • Seattle, WA 98108 • (206) 832-3000 • 1-888-832-3008 • Fax (206) 832-3030

Transporter: Emerald Services, Inc.  
7343 East Marginal Way S.  
Seattle WA 98108  
WAD 058 364 647

4) A description of the Type and Quantity of the Unmanifested PCB Waste Received at the Facility:

850 gallons of PCB contaminated used oil contributing to contamination of approximately 9,000 gallons of used oil at the Emerald Recycling facility.

5) A Brief Explanation of Why the Waste was Unmanifested:

The generator was unaware that the used oil was contaminated with PCBs.

6) The Disposition Made of the Unmanifested Waste by the Commercial Storage or Disposal Facility:

The unmanifested waste was temporarily stored in tanks at the Emerald Recycling facility located on Airport Way in Seattle until disposal arrangements could be made for the waste. Of the original contaminated volume of approximately 9,000 gallons, 29,872 kg of contaminated oil and decontamination fluids were shipped from the Emerald facility on April 24, 2009. Currently, there are three totes (275 gallons each) of contaminated used oil with decontamination fluids and one drum of contaminated PPE and debris that are awaiting shipment to the permitted TSDF. All shipments coordinated by Emerald were, or will be, accompanied by a Uniform Hazardous Waste Manifest.

Emerald will provide a complete report to EPA regarding receipt, on-site management, and off-site shipment of this PCB contaminated used oil once all documents pertaining to the issue have been received. This report from Emerald will include details of PCB data, on-site decontamination of tanks, and copies of manifests and certificates of disposal from the TSDF (Clean Harbors). If you have any questions in the meantime, please feel free to contact me at the numbers below.

Sincerely,



Sheila Smith, Environmental Coordinator  
Emerald Services, Inc.  
(206) 832-3204 (Office)  
(253) 370-7912 (Cell)  
(206) 832-3304 (fax)  
[sheilas@emeraldnw.com](mailto:sheilas@emeraldnw.com)

cc: Facility Operating Record